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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER
JEFF HATCH-MILLER
COMMISSIONER
MIKE GLEASON
COMMISSIONER

IN THE MATTER OF THE JOINT)
APPLICATION OF CITIZENS)
COMMUNICATIONS COMPANY AND)
UNISOURCE ENERGY CORPORATION)
FOR THE APPROVAL OF THE SALE OF)
CERTAIN ELECTRIC UTILITY AND GAS)
UTILITY ASSETS IN ARIZONA, THE)
TRANSFER OF CERTAIN CERTIFICATES)
OF CONVENIENCE AND NECESSITY)
FROM CITIZENS COMMUNICATIONS)
COMPANY TO UNISOURCE ENERGY)
CORPORATION, THE APPROVAL OF THE)
FINANCING FOR THE TRANSACTIONS)
AND OTHER RELATED MATTERS)

E-01933A-02-0914
DOCKET NO. G-01032A-02-0914
E-01032C-02-0914

Arizona Corporation Commission
DOCKETED

JAN 15 2003

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CITY OF NOGALES' APPLICATION TO INTERVENE

I.

The City of Nogales ("Nogales") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in the above-captioned proceeding.

II.

Nogales is an Arizona municipal corporation located within the Certificates of Convenience and Necessity issued by the Commission to Citizens Communications Company

1 ("Citizens") to provide electric and natural gas utility service in Santa Cruz County, Arizona.

2 III.

3 Nogales is one of the largest customers of Citizens' for electricity, and is also a natural
4 gas customer. Nogales also represents the residents, business and industries within its
5 incorporated limits as to public health, safety and welfare issues. In such capacity Nogales has
6 filed complaints against Citizens before the Commission in the past related to inadequate energy
7 services, and Nogales has opposed rate increase requests of Citizens before the Commission in
8 the past.

10 IV.

11 The proposed transfer of the Certificates of Convenience and Necessity ("CC&NS")
12 from Citizens to Unisource Energy Corporation ("Unisource") dramatically affects both the
13 quality and cost of energy services proposed to be provided to Nogales and its residents.
14 Therefore Nogales has a substantial interest in participating in the Commission's proceedings
15 relating to the request by Citizens and Unisource (the "Joint Applicants") to transfer Citizens'
16 CC&NS to Unisource. Therefore it is necessary and proper that Nogales intervene in the
17 proceeding.

20 V.

21 In order to protect its interests as a customer and a representing of its residents, Nogales
22 must thoroughly examine the materials presents by the Joint Applicants, and must cross-examine
23 witnessed appearing on behalf of the Joint Applicants and any other parties. Additionally,
24 Nogales may present testimony and exhibits of its own in any hearings conducted by the
25 Commission in this matter.

VI.

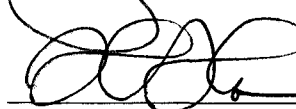
The name, mailing address, and telephone number of the person upon whom service of all documents is to be made is:

Jose Machado, City Attorney
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RESPECTFULLY SUBMITTED this 14th day of January, 2003.



Jose Machado, City Attorney



Hugh Holub, Attorney

City of Nogales, Arizona

1 AN ORIGINAL AND THIRTEEN COPIES
2 of the foregoing filed this 14th day of January, 2003
3 with:

3 Docket Control
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6 COPIES of the foregoing mailed this 14th day of
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